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November 9, 2022

**BY ECF**

Hon. Colleen McMahon  
United States District Judge  
U.S. District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10017

11/9/2022  
OK  
Colleen McMahon

Re: *United States v. Leroy Gibbs*, 22-CR-534 (CM)

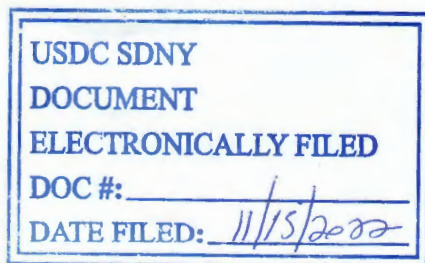
Dear Judge McMahon:

MEMO ENDORSED

We respectfully request that your Honor modify Mr. Leroy Gibbs's conditions of release, pursuant to 18 U.S.C. § 3142(c)(3), to permit Mr. Gibbs to travel to Ocoee, Florida to be with family over the holidays. We have spoken with Mr. Gibbs's Pretrial Services Officers, Christina Venable and Andrew Berglind, and they have no objections.

Mr. Gibbs hopes to depart on or about December 17, 2022 and return on or about January 13, 2023. Because Mr. Gibbs is restricted to the Southern and Eastern Districts of New York, we respectfully request that he be permitted to travel to Florida during this time. The Government takes no position on this request and defers to Pretrial Services.

Thank you for your consideration.



Respectfully submitted,

/s/

Michael W. Martin, Esq.  
Lincoln Square Legal Services, Inc.  
Attorney for Mr. Gibbs

cc: Catherine Ghosh / Robert B. Sobelman  
Assistant United States Attorneys  
**BY EMAIL AND ECF**